

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

K.H., by and through his Guardian ad Litem,
John D. Elliott,

Plaintiff,

v.

South Carolina Department of Social Services
(SCDSS), Anna Jones, Pheshe Johnson, Maya
Simone, Social Worker Jane Roe 1, Social
Worker Supervisor Jane Roe 2, Booker
Counts, and Linda Counts,

Defendants.

Civil Action No. 3:16-cv-02224-JFA

26.01 INTERROGATORIES

Plaintiff answers the Court's Local Rule 26.01 Interrogatories below:

1. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Answer:

- a. Upon information and belief, South Carolina Department of Health and Human Services - Medicaid;**

2. As to each claim, state whether it should be tried jury or nonjury and why.

Answer:

- a. Plaintiff has requested a jury trial for each trial.**

3. State whether the party submitting these responses is a publicly-owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock: (2) each publicly-owned company of

which it is a parent and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

Answer:

a. Plaintiff is an individual and does not own shares of any publically owned company.

4. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

Answer:

a. The acts that occurred in this matter and some of the Defendants in this matter are located in Kershaw County.

5. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Answer:

a. No.

Respectfully submitted,

Foster Care Abuse Law Firm, PA

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Manning, South Carolina
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